

Maria A. Bourn  
Anthony Tartaglio  
GOMERMAN | BOURN & ASSOCIATES  
825 Van Ness Ave, Suite 502  
San Francisco, CA 94109  
Telephone: (415) 545-8608  
Email: maria@gobolaw.com  
tony@gobolaw.com

Attorneys for Plaintiff  
NEELAM SANDHU

Katherine M. Forster (SBN 217609)  
Katherine.Forster@mto.com  
Craig Jennings Lavoie (SBN 293079)  
Craig.Lavoie@mto.com  
Lauren N. Beck (SBN 434375)  
Lauren.Beck@mto.com  
Kyra E. Schoonover (SBN 343166)  
Kyra.Schoonover@mto.com  
MUNGER, TOLLES & OLSON LLP  
350 South Grand Avenue, Fiftieth Floor  
Los Angeles, California 90071-3426  
Telephone: (213) 683-9100  
Facsimile: (213) 687-3702

Attorneys for Defendant BLACKBERRY  
CORPORATION

**UNITED STATES DISTRICT COURT**  
**FOR THE NORTHERN DISTRICT OF CALIFORNIA**

Neelam Sandhu, an individual,

Plaintiff,

vs.

BLACKBERRY CORPORATION; a  
Delaware Corporation,

Defendant.

**Case No.: 3:24-cv-02002-SK**

**JOINT STIPULATION AND ORDER  
REGARDING SCHEDULE FOR  
DEFENDANT'S MOTION FOR SUMMARY  
JUDGMENT**

Judge: Hon. Sallie Kim

Pursuant to Civil Local Rules 7-11 and 7-12, Plaintiff Neelam Sandhu and Defendant BlackBerry Corporation, by and through their respective counsel, hereby agree as follows:

WHEREAS, on October 27, 2025, the Court issued an Amended Case Management and Pretrial Order setting the "last day for hearing on dispositive motions" for March 9, 2025. *See* Dkt. No. 95 at 2.

WHEREAS, the Court's Order set specific briefing deadlines for cross-motions for summary judgment and provided only that, "[i]f only one side intends to file a motion for summary judgment, the briefing schedule set forth in the Northern District Local Civil Rules applies," *id.* at 2.

1 WHEREAS, Defendant intends to file a motion for summary judgment;

2 WHEREAS, Plaintiff does not intend to file a motion for summary judgment;

3 WHEREAS, due to unavailability of the Court and counsel in February 2026, Defendant  
4 wishes the motion to be heard on January 26, 2026;

5 WHEREAS, the parties have met and conferred and reached agreement on a schedule for  
6 Defendant's motion for summary judgment and associated briefing that accommodates the  
7 availability of Plaintiff's counsel and their staff over the holidays;

8 WHEREAS, the Parties submit that the proposed schedule does not affect any other Court-  
9 ordered deadline, and should not result in prejudice to any of the parties;

10 THEREFORE, IT IS STIPULATED AND AGREED, subject to the Court's approval, that  
11 the schedule for Defendant's Motion for Summary Judgment and any associated briefing on shall  
12 be as follows:

Event	Date
Defendant's Motion for Summary Judgment	December 10, 2025
Plaintiff's Opposition	January 5, 2026
Defendant's Reply	January 12, 2026
Hearing on Motion for Summary Judgment	January 26, 2026

20 Dated: December 5, 2025

MUNGER, TOLLES & OLSON LLP

23 By: /s/ Katherine M. Forster  
KATHERINE M. FORSTER

25 Attorneys for Defendant  
26 BLACKBERRY CORPORATION

1 Dated: December 5, 2025

GOMERMAN | BOURN & ASSOCIATES

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3 By: /s/ Anthony Tartaglio  
4 ANTHONY TARTAGLIO

5 Attorneys for Plaintiff  
6 NEELAM SANDHU  
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**ORDER**

Pursuant to the parties' stipulation and for good cause shown, the Court HEREBY SETS the following summary judgment briefing and hearing schedule:

Event	Date
Defendant's Motion for Summary Judgment	December 10, 2025
Plaintiff's Opposition	January 5, 2026
Defendant's Reply	January 12, 2026
Hearing on Motion for Summary Judgment	January 26, 2026

The Court HEREBY ORDERS the parties to comply with this briefing and hearing schedule, should Defendant file its motion on or before December 10, 2025.

**IT IS SO ORDERED.**

Dated: December 5, 2025

By: 

SALLIE KIM

UNITED STATES MAGISTRATE JUDGE

**E-FILING ATTESTATION**

I, Katherine M. Forster, am the ECF User whose ID and password are being used to file this document. In compliance with Civil Local Rule 5-1(i)(3), I hereby attest that counsel for Defendants have concurred in this filing.

*/s/ Katherine M. Forster*

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Katherine M. Forster